

ORIGINAL

JUDGE KEENAN

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA : INFORMATION

: - v. -

MILESH TALREJA,

Defendant.

- - - - - X

COUNT ONE  
(Bank Fraud)

The United States Attorney charges:

1. From at least on or about November 7, 2019 up to and including at least on or about November 14, 2019, in the Southern District of New York and elsewhere, MILESH TALREJA, the defendant, did execute and attempt to execute a scheme and artifice to defraud financial institutions, the deposits of which were then insured by the Federal Deposit Insurance Corporation, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such financial institutions, by means of false and fraudulent pretenses, representations, and promises, to wit, TALREJA deposited at a bank branch in Manhattan, New York, a \$500,000 check that was drawn upon a bank account containing approximately \$5,608.99, and thereafter withdrew and attempted to withdraw the fraudulently-deposited funds.

USDC SDNY  
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(Title 18, United States Code, Sections 1344 and 2.)

**FORFEITURE ALLEGATION**

2. As a result of committing the offense alleged in Count One of this Information, MILESH TALREJA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(2)(A), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

**Substitute Assets Provision**

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States

Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 982; Title 21, United States Code, Section 853; and Title 28, United States Code, Section 2461.)

  
Geoffrey S. Berman  
GEOFFREY S. BERMAN  
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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INFORMATION

20 Cr.

(18 U.S.C. § 1344)

GEOFFREY S. BERMAN  
United States Attorney

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